

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN  
PRODUCTS LIABILITY LITIGATION  
Civil No. 19-2875 (RBKJS)  
THIS DOCUMENT RELATES TO  
ALL CASES

MDL No. 2875

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO REMEDY REPACK,  
INC.**

**WHEREAS** the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs ("VCDs") ;

**WHEREAS** Remedy RePack, Inc., having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiffs Executive Committee and Remedy RePack, Inc. that all current cases pending and all future cases to be filed in this MDL alleging claims against Remedy RePack, Inc. in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ Marlene Goldenberg  
MARLENE GOLDENBERG, ESQ.  
On behalf of Plaintiffs' Executive Committee

Dated: April 19, 2022

/s/ Howard B. Mankoff  
HOWARD B. MANKOFF, ESQ.  
**MARSHALL DENNEHEY**  
On behalf of Peripheral Defendant, Remedy RePack, Inc.

Dated: April 1, 2022